

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

February 25, 2022

BY ECF

Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007



**Re: United States v. Jeremy Spence
21 Cr. 116 (LAK)**

Dear Judge Kaplan,

I write to request that the Court adjourn the sentencing in the above-captioned case, which is currently scheduled for March 31, 2022, for approximately 60 days. The requested adjournment will enable the defense to effectively prepare for sentencing. We are in the process of collecting supporting documentation and need the requested time to complete our preparation.

The government by Assistant United States Attorney Christine Magdo consents to this request (and is available except for May 26).

Thank you for your consideration.

Respectfully submitted,

/s/
Sylvie Levine
Counsel for Mr. Spence
212-417-8729

The defendant pled guilty on
11/30/21 and times already has
had 3 months within which to
prepare for sentencing. The
explanation for an additional
motion is insufficient. There
is no specific reason why the
defendant can't prepare by 3/31/22,
is should have been disclosed.
DENIED.

LEWIS A. KAPLAN, USDC

2/28/22